

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

IN RE:	§	
	§	CASE NO. 15-20032
TEXAS ENTERPRISES, LLC	§	
D/B/A BLUEBONNET ELITE	§	
ASSISTED LIVING	§	
DEBTOR,	§	
	§	CHAPTER 11
	§	

**WITNESS/EXHIBIT LIST OF
MUFG UNION BANK, N.A. FOR HEARING ON CONFIRMATION OF DEBTOR'S
CHAPTER 11 PLAN OF REORGANIZATION (Dkt No. 78)**

**TO THE HONORABLE
UNITED STATES BANKRUPTCY JUDGE:**

COMES NOW, MUFG UNION BANK, N.A., ("Union Bank") intends to use the following exhibits in connection with its objection to Debtor's proposed Chapter 11 Plan of Reorganization filed by Debtor (Docket No. 78).

I. EXHIBITS

It is requested that the Court take judicial notice of all pleadings and documents filed with the Court in the above cause and properly served as noted in the docket report for the above case, including but not limited to the following:

- A. Plan of Reorganization and Disclosure Statement filed by Debtor, dated October 28, 2015 and all exhibits attached thereto (Docket No. 78, Judicial Notice requested).
- B. Chapter 11 Small Business Disclosure Statement filed by Debtor and all exhibits attached thereto (Docket No. 79, Judicial Notice Requested).
- C. All Operating Reports/Cash Flow Statements filed by the Debtor and all exhibits attached thereto (Docket #'s 31, 38, 39, 47, 52, 56, 57, 75, 77 & 88).

- D. All Exhibits listed in Debtor's List of Exhibits to be presented by Debtor at the confirmation hearing and any exhibits submitted by any other interested party at the confirmation hearing.

II. WITNESSES

1. Corporate Representative of Union Bank, N.A.
2. Any Witness designated by Debtor to testify at the hearing on confirmation of the Debtor's Chapter 11 Plan of Reorganization and any other witnesses designated or called by any other interested party.

Respectfully submitted,

ANDERSON VELA, L.L.P.

/S/ RICHARD ANDERSON

Richard E. Anderson

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COUNSEL FOR UNION BANK, N.A.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing has been this date served electronically or mailed to the parties listed below.

Debtor

Texas Enterprises, LLC
d/b/a Bluebonnet Elite Assisted Living
102 Floyd St.
Naples, Texas 75568
Via Regular Mail

Debtor's Attorney

Joshua P. Searcy
Searcy & Searcy, .C.
P.O. Box 3929
Longview, TX 75606
Via Electronic Service

US TRUSTEE

Marcus Salitore
US Trustee Office
110 N. College
Ave., Room 300
Tyler, TX 75702
Via Electronic Service

Date: December 10, 2015

/s/ Richard E. Anderson
RICHARD E. ANDERSON